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MANUAL FOR PREPARATION AND REVISION OF SUMMARY REPORTS

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MANUAL FOR PREPARATION AND REVISION OF SUMMARY REPORTS

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
Public Health Service
Division of Water Supply & Pollution Control
Enforcement Branch

October 1959

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MANUAL FOR PREPARATION AND REVISION OF SUMMARY REPORTS

INTRODUCTION

PURPOSE OF A SUMMARY REPORT

The purpose of a summary report is to show factually in a brief document the presence or absence of interstate pollution in an interstate water body; when present, its effect on water uses in the receiving State; its sources; and area affected - upper and lower limits.

Summary reports will be used by officials of the Public Health Service and the Enforcement Branch in answering queries, frequently from Members of Congress. In addition, these reports will provide a basis for evaluating the need for enforcement action.

Responsibility for the collection of engineering data on pollution, interpretation thereof, for making engineering judgments and determinations relative to the existence or non-existence of pollution and its effect on water uses, lies with the Regional Program Directors. It is therefore the primary responsibility of the Regional Program Directors to secure such data and to incorporate it, together with their judgments and determinations in a summary report in the form established by the Enforcement Branch, together with other factual data called for by that form.

The function of the Enforcement Branch is to review, revise and edit the Region's summary reports so as to assure nationwide uniformity, internal consistency, and completeness.

Adequate administration of section 8 of the Federal Water Pollution Control Act requires the preparation of summary reports which

establish the existence or non-existence of interstate pollution in all interstate waters. If interstate pollution exists, the report must show each and every such interference with each and any legitimate water use either existing or potential, for which the water could be used if in its natural state but which is limited, prevented, restricted, or otherwise hindered or adversely affected by the interstate pollution. This Department's responsibility encompasses intermittent, periodically recurrent, and seasonal interstate pollution as well as that which is continuous. Responsibility for the preparation of factual reports on the actual condition of interstate streams and for investigation and pollution control enforcement actions also rests with this Department regardless of the attitude of the receiving State and downstream water-users, to polluted waters or state classifications. The fact that particular legitimate uses for which the water would be suitable except for the pollution, are not being made does not alter the Department's responsibility.

PROCEDURE

The procedure for developing summary reports begins with their initial preparation in the Region. The first draft is forwarded to the Enforcement Branch where it is reviewed and, if necessary, revised. It is then returned to the Region for its review, changes and/or approval. The Regional Program Director should mark its changes on the draft and sign it "approved".

In the event more than one Region is concerned with a particular summary report, the approval of all such Regions will be needed. The procedure in such a case will be to obtain the approval of the downstream Region (which will prepare the report initially) and, following that, the approval of the upstream Region.

Following the approval of the Region or Regions involved, the summary will be prepared in mimeograph form with a map to be prepared at Headquarters. Mimeographed copies of the report will be furnished the Regions and all States affected. Copies will be furnished the Sanitary Engineering Center at Cincinnati, Ohio, which will in some instances be requested by the Enforcement Branch to review the drafts before final approval. Other copies will be retained in the Enforcement Branch to be distributed only with the approval of the Chief or Assistant Chief of the Branch.

REVIEW AND REVISION BY ENFORCEMENT BRANCH

The purpose is twofold - for substance and form.

A. The substantive review is made to determine the sufficiency, consistency, and clarity of data submitted.

Sufficiency is established by:

1. Checking data presented against the written outline for summary reports prepared by the Enforcement Branch; (see Appendix A)
2. Checking given facts against known conditions, "Inventories," and if necessary, source material available in the Enforcement Branch's files, in the Reports Section, or Reference Room, or by raising questions with the responsible Region.

Consistency is established by comparison of facts and figures given by the preparing Region in one section against those in other sections of the summary report.

Clarity is established by editing, checking source material, or questioning the Region.

B, Formal revision is made by recasting the material submitted by the region into the pre-established format.

INSTRUCTIONS

REVIEW AND REVISION BY HEADQUARTERS

Each summary report will be checked item for item against the summary outline and any omissions in the Region's summary noted. The Region will be questioned on each omission unless the reason is obvious from the text of the summary report.

All the work of providing technical details and data will be done by the Regional Program Director. Hence, if there are any gaps in the information provided, or any inconsistencies, the Region will be asked in a covering transmittal memorandum to provide the necessary information or to explain the apparent inconsistency. If needed data is readily at hand from sources here, the Enforcement Branch should suggest, in the covering memorandum that the Region approve its use.

Excessive research by the Enforcement Branch is not to be performed. Review of source material should be resorted to only in case of doubt, for one's own background information, better to describe the "location" of the water body, or for similar purposes.

Additional information will normally not be supplied by the Enforcement Branch. If additional information is readily available here, it should be brought to the attention of the Region in the covering memorandum with a request to the Region that it review the new material with a view to including it in the summary report. The covering

memorandum should indicate that the new material is "suggested" for inclusion in the summary report, not that it must be included.

The source of any and all data supplied by the Enforcement Branch from any source other than that from unpublished material furnished by the Region and found in the Branch's files, will be identified in a footnote.

Footnotes will take the following form:

(Author) (Title - underscored) (Place of publication) (Publisher) (Date) (Series, if any) (Page number)

Footnotes to the main text of the summary report will be numbered and will appear at the bottom of each page where references to them appear. Footnotes to each appendix will be numbered and will appear at the bottom of each page of the appendix where references to them appear. Each appendix's footnotes will be independent of those of other appendices or the main text.

PREPARATION, REVIEW AND REVISION BY REGIONS

1. Brevity

A summary report should be as short as possible. Statements such as "There is no interference with the use of water for public water supply," or "There is no interference with the use of water for recreation," etc. should be avoided. Canvassing all the possibilities in this manner and stating that interferences do not exist, unduly extends the size of the summary report and adds nothing. It is here established as a convention that if a

particular water use interference is not mentioned, such water use interference does not exist. If no water uses are interfered with, the word "NONE" should appear under the heading "Interference with water uses."

The content of each section of the summary report should be restricted rigorously to the material called for by the outline. Where material appears in the summary report which is not covered by a section heading, this will be deleted, transferred to another section where it is more appropriate, or placed in an appendix by the Enforcement Branch.

To avoid excessive length where details are considered helpful but not absolutely essential to the report, such material should be placed in an appendix and reference made to it in the appropriate portion of the summary report.

2. Geographical Designations

Wherever geographical names appear in the summary report, the name of the State in which each is located should accompany each name. This should be done throughout the report even though duplication may result. This is necessary inasmuch as a reader often will refer only to a single section of the report. It cannot be assumed that persons using the report will read the entire report every time or be familiar with the location of the places named.

3. Date of Report

Date each draft prepared with the date of its completion for purposes of identification. The title will indicate the currency of the material included.

4. Completeness and sufficiency

Name the place and give the dates and authority in all actions noted in the summary report, i.e. "The X State Water Pollution Control Board on July 21, 1955 ordered the Y City to cease polluting the Z River by January 1, 1957." Do not say: "The Y City was ordered to abate its pollution."

Say: "The X State Water Pollution Control Board, during 1955, made a survey of the river for 10 miles above and five miles below Z City for the purpose of determining the extent of the bacteriological contamination of the river. It published the findings of the survey in 1956 in a report entitled '- - - - - -'." Do not say: "The river was surveyed and the results published in 1956."

Do not say: "The State regulations require abatement, effective January 1, 1958." but say: "The State regulations, which become effective January 1, 1958, require (state the specific requirement) within X months of notice by the X Agency of violation of the State Sanitary Code." (or such other facts as happen to be the case.)

The purpose of the summary, as stated above, is to show the presence or absence of interstate pollution of interstate waters. The summary report will serve this purpose only when as a whole it is factually sufficient and factually consistent as to conclusions throughout. Therefore, it is necessary to determine that it establishes factually that:

1. The water body is "interstate" within the meaning of Section 11(d) of the Federal Water Pollution Control Act, or

2. Interstate water pollution exists, i.e. pollution originating in one State reaches another State via the described interstate water body - section 8(a)
3. This pollution endangers the health or welfare of the people in the receiving state, i.e. interferes with water uses.

The sufficiency of a summary report depends upon the particularity of necessary facts and the consistency of the resultant conclusions throughout the report. In reviewing a summary report for these aspects, the facts and conclusions in each section must be compared with those of each other section so as to delete inconsistencies and assure that all necessary facts are complete.

The tabulation of sources of pollution (Table No. 1) should include not only sources of pollution in the upstream State, but in the downstream State as well, if they contribute to the pollution which interferes with water uses in that State. Although the Division's powers under the Federal Water Pollution Control Act do not cover the sources of pollution in the downstream State, their existence is a factor of great importance in presenting a complete picture of the pollution situation, in assessing the situation in terms of enforcement action, in conducting a formal conference, and in prescribing remedial action needed to abate the pollution problem.

(Date Report Prepared and Office Preparing Report)

APPENDIX "A"

(Format of a Summary Report)

SUMMARY REPORT ON QUALITY OF INTERSTATE WATERS

(NAME OF STREAM)

(NAMES OF ALL STATES INVOLVED)

(Data Current to_____)

I. LOCATION

a. The river -- give:

Place of origin; direction of flow; States crossed or bordered, mention all interstate border crossings giving river mile; place where stream empties into other water body and name of that water body.

b. Does the river form a State boundary or flow along such? - name States.

c. Define stream stretch under discussion if different from whole stream.

d. Major cities in summary report area.

e. Name and describe all major tributaries of the stream in the area covered by the summary report, indicating main stem river miles of junction points.

II. SOURCES OF POLLUTION

a. If one or more of the municipalities or industries is a major contributor to interstate pollution, state here. If one or more types of waste is a major factor in the interstate pollution problem, state here.

b. Tabular presentation as follows:

TABLE NO. 1 - BASIC DATA ON SOURCES OF POLLUTION

Municipality or Industry	River Miles Above Mouth	Sewered Population	P. E. Waste Before Treatment	Nature of Wastes	Treatment Provided	P. E. Discharge to Watercourse
Municipalities and industries, sewer districts and industries or institutions not in urban areas, etc., will be listed in order of distance from river mouth with river miles shown, the sources farthest from mouth of river will appear first. Tributaries will also be listed in order of distance from river mouth of main stream; tributaries to tributaries will be noted in the same fashion. Industries in each municipality discharging waste independently of the municipal sewage system will be listed alphabetically under each municipality in which located. Follow indentation system illustrated below.			Population Equivalent of Waste Before treatment. Where information is not available use: "Undet." Where waste is inorganic or a combination of organic and inorganic state this.	As described in information source-- "Municipal" "Food Products" "Industrial" "Sanitary etc." "Domestic"	"None" "Primary" "Secondary" If reports indicate specific type: as Septic Tanks, lagoons, or other special treatment, enter this	As column title indicates. Where information is not available use "Undet." Where inorganic wastes are discharged state: "Inorganic", etc or combination as appropriate

TABLE NO. 1 - BASIC DATA ON SOURCES OF POLLUTION

Municipality or Industry (cont'd)	River Miles Above Mouth	Sewered Population	P. E. Waste Before Treatment	Nature of Wastes	Treatment Provided	P. E. Discharge to Watercourse
State lines crossed or met in the case of boundary streams, will be stated with river miles shown.						
Include source of pollution relevant to an understanding of the situation in the downstream as well as the upstream State. Do not stop at the State line.						

INDENTATIONS, CAPITALIZATION AND UNDERLINING TO BE USED FOR TABLE NO. 1

Municipality or Industry	River Miles Above Mouth	
Red River		
Extown, State	105	(Round to nearest mile except where necessary to distinguish between closely located sources of pollution)
Joe Blow Industry		
State Sewer District, State	102	
Richard Roe Plant, State	100	
White Branch	98	(Use system of watercourse mileage appearing on page XVII of any "Inventory of Municipal and Industrial Waste Facilities". However, sources farthest from mouth should be first, the closest last.)
Blue Creek	98-10	
Yellow Run	98-10-5	
Alphatown, State	98-10-5-7	
Yellow Run District, State	98-10-5-3	
White Branch	98	
A Town, State	98-5	

INDENTATIONS, CAPITALIZATION AND UNDERLINING TO BE USED FOR TABLE NO. 1

Municipality or Industry (cont'd)	River Miles Above Mouth
Red River	
Betatown, State	96
Delta Plant	
Gamma Sewer District, State	94
State Line	93
Black River	90
Green Branch	90-10
Essetown, State	90-10-2
Red River	
Fifitown	89

c. [The following paragraph must appear at this point in each summary.]

To date discharges to the (name water body) from the sources of pollution in (name polluting State or States) have continued as indicated above.

d. State stream flow data of relevant points in terms of average and minimum. Use the following table if data are adaptable:

TABLE NO. 2 - STREAM FLOW DATA IN cfs

No. and Location of gaging station	Years of Record	Average	Maximum	Minimum

e. Additional water quality information may be placed here but included only if absolutely necessary to understanding of situation. Placement of such information in an appendix is normally preferable.

III. INTERFERENCE WITH WATER USES

a. If no interference, state "None"

b. If there is interference, use the following language: Wastes discharged into the [name of water body] from sources in [name State or States] interfere with water uses in [name of receiving State or States] by causing:

1. Deterioration of water quality so as to (state briefly the nature of interference, substantiate conclusion by facts, and define area affected if less than the whole area covered by the summary report.)

Include the following if applicable in the order listed:

1) Public Water Supply - include location, coliform data (if available), chemical interference data, etc.

2) Health of boaters, fishermen, etc. - coliform data.

3) Sport Fishing - include D.O. and chemical pollution data.

4) Commercial Fishing - include, in addition to that for 2) above, appropriate data to substantiate the commercial aspects.

5) Water Sports - include coliform data - specify the sport, i.e., "bathing," "boating," etc.

6) Industrial Uses - include data on specific water quality needs of industry and other appropriate substantiating data, such as industries which have rejected sites on water body, etc.

7) Irrigation - include information as to type of crop irrigated.

8) Stock watering.

9) Public Nuisance - specify the type, i.e., odor, sight, etc. substantiate conclusion by facts indicating floating objects, odor, sludge deposits, etc.

10) Other recreational uses - specify kind of recreational use as picnicking, camping, etc.

11) Navigation - sludge deposits on bed of river, damage to paint on boats - damage to navigational aids, etc.

12) Potential interference with any of above uses.

[In all of the above uses, state relevant technical data as briefly as possible and define specific areas affected if less than the whole stretch of the area covered by the summary.]

IV. ADEQUACY OF TREATMENT MEASURES

For all sources of pollution noted in Table No. 1 which have treatment facilities, include here an evaluation of their adequacy. Use summary statements wherever possible such as: "Communities X, Y, and Z in State A have primary treatment facilities which are inadequate."

V. ACTION OF OFFICIAL AGENCIES

a. Federal and Federal-State joint action

1. Name published studies on the stream. Specify authors and dates of both the study and the publication. If many, name major studies only, refer to Bibliography for remainder, i.e., use note "See Bibliography attached for other studies."

2. Note Federal action in attempting to secure abatement. Include construction grants in a tabulation showing details of grant offers.

TABLE NO. 3 - PUBLIC HEALTH SERVICE GRANTS FOR CONSTRUCTION OF WASTE TREATMENT FACILITIES

Municipality	Date Approved	Amount	Estimated Total Cost of Project	Type of Project	Status of Project

List interstate commissions or compacts on pollution abatement. [Include summary of State-membership, date of formation, purpose, etc.]

c. State Action

1. Studies, surveys, and investigations.
2. State actions in attempting to secure abatement, including formal orders, hearings, court action, including dates of actions and deadlines set.
3. Actions by municipalities involved including, compliance or non-compliance of localities with orders or recommendations of superior government bodies.

d. Other Actions

Actions or complaints by other organizations, persons, etc. [Give time allowed for action and date of all actions wherever possible throughout this section.]

VI. NATURE OF DELAYS IN ABATING POLLUTION

a. The delays - describe reasons or causes for delays [Specify agency causing delay where possible.]

Specify:

1. State
2. Municipality
3. Industry

b. Time delays caused.

c. If none, state "none."

VII. TIME SCHEDULE FOR PROPOSED REMEDIAL ACTION

a. If any time schedules have been developed, state them.

1. Who developed them?
2. When?

b. If none, state "none."

ADDENDA

BIBLIOGRAPHY [Separate Sheet]

[All published source materials should be stated here - include author, title - underscored, publication location, publisher, date, and series, if any.]

APPENDICES [Separate sheets for each]

Identify with alphabetical designation, i.e., "Appendix A" etc. Include statements of pertinent technical data not for inclusion in body of report. Also place here excessively detailed data desirable for implementation of data in body of summary report.

MAP

Following receipt of a summary report, a map will be prepared by the Enforcement Branch. It will locate each geographical place or name used in the summary report, each water body, and when possible, show river mileage of important points. During revision and exchanges of drafts between the Region and Headquarters, maps need not be included.